

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TRAVELERS CASUALTY AND SURETY COMPANY as  
Administrator for RELIANCE INSURANCE  
COMPANY,

Plaintiff,

vs.

DORMITORY AUTHORITY – STATE OF NEW YORK,  
TDX CONSTRUCTION CORP. and KOHN  
PEDERSEN FOX ASSOCIATES, P.C.,

Defendants.

DORMITORY AUTHORITY OF THE STATE OF NEW  
YORK,

Third-Party Plaintiff,

vs.

TRATAROS CONSTRUCTION, INC.,

Third-Party Defendant.

TRATAROS CONSTRUCTION INC., and TRAVELERS  
CASUALTY AND SURETY COMPANY,

Fourth-Party Plaintiffs,

vs.

CAROLINA CASUALTY INSURANCE COMPANY;  
BARTEC INDUSTRIES, INC.; DAYTON SUPERIOR  
SPECIALTY CHEMICAL CORP. a/k/a DAYTON  
SUPERIOR CORPORATION; SPECIALTY  
CONSTRUCTION BRANDS, INC. t/a TEC; KEMPER  
CASUALTY INSURANCE COMPANY d/b/a KEMPER  
INSURANCE COMPANY; GREAT AMERICAN  
INSURANCE COMPANY; NATIONAL UNION FIRE  
INSURANCE COMPANY OF PITTSBURGH, P.A.;  
UNITED STATES FIRE INSURANCE COMPANY;  
ALLIED WORLD ASSURANCE COMPANY (U.S.) INC.  
f/k/a/ COMMERCIAL UNDERWRITERS  
INSURANCE COMPANY; ZURICH AMERICAN  
INSURANCE COMPANY d/b/a ZURICH INSURANCE  
COMPANY; OHIO CASUALTY INSURANCE  
COMPANY d/b/a OHIO CASUALTY GROUP;  
HARLEYSVILLE MUTUAL INSURANCE COMPANY  
(a/k/a/ HARLEYSVILLE INSURANCE COMPANY);  
JOHN DOES 1-20 and XYZ CORPS. 1-12,

Fourth-Party Defendants.

Case No. 07-CV-6915 (DLC)  
ECF CASE

**DOCUMENT ELECTRONICALLY  
FILED**

**NOTICE OF MOTION FOR  
ADMISSION PRO HAC VICE**

**PLEASE TAKE NOTICE**, that upon the Declaration of Henry G. Morgan, Esq., sworn to on January 30, 2008 and the Declaration of Joseph DeDonato, sworn to on January 30, 2008, the undersigned will move this Court, at the United States District Court for the Southern District of New York located at 500 Pearl Street, New York, New York on a date and time to be fixed by the Court, for an order granting admission pro hac vice attorney Henry G. Morgan, Esq. of the law firm of Morgan Melhuish Abrutyn, for the purpose of discovery and trial of the within matter, pursuant to Local Rule 1.3 (c).

**PLEASE TAKE FURTHER NOTICE** that answering affidavits, if any, are to be served upon the undersigned no later than seven (7) days prior to the return thereof.

MORGAN MELHUIH ABRUTYN

/S/ Joseph DeDonato  
JOSEPH DEDONATO, ESQ.  
39 Broadway, 35<sup>th</sup> Floor  
New York, New York 10006  
(212) 809-1111  
Attorneys for defendants, Ohio Casualty  
Insurance Co. d/b/a Ohio Casualty Group

TO:

Guido Weber, Esq.  
Dreifuss, Bonacci & Parker, LLP  
26 Columbia Turnpike, North Entrance  
Florham Park, NJ 07932  
*Attorneys for Fourth-Party Plaintiffs,*  
*Trataros Construction, Inc. and Travelers Casualty*  
*an Surety Company*

David Abramovitz, Esq.  
Zetlin & DeChiara, LP  
801 Second Avenue  
New York, New York 10017

*Attorneys for Defendant  
Kohn, Pederson, Fox & Associates, P.C.*

Stephen B. Shapiro, Esq.  
Holland & Knight, LLP  
195 Broadway  
New York, New York 10007  
*Attorneys for Defendant,  
Dormitory Authority of the State of New York & TDX Construction Corp.*

Gary L. Rubin, Esq.  
Mazur, Carp & Rubin, P.C.  
1250 Broadway, 38<sup>th</sup> Floor  
New York, New York 10001  
*Attorneys for Defendant,  
TDX Construction Corp.*

Joseph S. Weiner, Esq.  
Law Office of Vincent P. Crisci, Esq.  
17 State Street, 8<sup>th</sup> Floor  
New York, NY 10004  
*Attorneys for Poulon-Morris, Inc.*

Jeremy Platek, Esq.  
O'Connor, Redd, Gollihue & Sklarin, LLP  
200 Mamaroneck Avenue, 2<sup>nd</sup> Fl.  
White Plains, New York 10601  
*Attorneys for Fourth-party Defendant,  
Bartec Industries, Inc.*

Thomas M. DeSimone, Esq.  
Goldberg Segalla, LLP  
170 Hamilton Avenue, Suite 203  
White Plains, New York 10601  
*Attorneys for Fourth-Party Defendant,  
Dayton Superior Specialty Chemical Corp.*

Christian H. Gannon, Esq.  
Segal, McCambridge, Singer & Mahoney, Ltd.  
805 Third Avenue, 19<sup>th</sup> Floor  
New York, New York 10022  
*Attorneys for Fourth-Party Defendant,  
Specialty Construction Brands, Inc. t/a TEC*

Diana E. Goldberg, Esq.  
Mound Cotton Wollan & Greengrass

One Battery Park Plaza, 9<sup>th</sup> Floor  
New York, New York 10004  
*Attorneys for Fourth-Party Defendant,  
Allied World Assurance Company*

Donald G. Sweetman, Esq.  
Gennet, Kallmann, Antin & Robinson, P.C.  
6 Campus Drive  
Parsippany, NJ 07054  
*Attorneys for Fourth-Party Defendant,  
Great American Insurance Company*

Paul A. Winick, Esq.  
Thelan, Reid & Priest, LLP  
875 Third Avenue  
New York, New York 10022  
*Attorneys for Third-Party Defendant,  
L.B.L. Skysystems*

Steven Alan Coploff, Esq.  
Steinberg & Cavaliere, LLP  
50 Main Street  
White Plains, NY 10606  
*Attorneys for Third-Party Defendant  
Kemper Insurance Company*

John P. DeFilippis, Esq.  
Carroll, McNulty & Kull  
570 Lexington Avenue, 10th Fl.  
New York, New York 10016  
*Attorney for Fourth-Party Defendant  
United States Fire Insurance Company*

S. Dwight Stephens, Esq.  
Melito & Adolfsen, P.C.  
233 Broadway  
New York, New York 10279  
*Attorneys for Fourth-Party Defendant  
Zurich American Insurance Company*

Martin A. Schwartzberg, Esq.  
L'Abbate, Balkan, Colavita & Contini, LLP  
1050 Franklin Avenue  
Garden City, NY 11530  
*Attorneys for Third-Party Defendant  
Cosentini Associates, Inc.*

Terrence J. O'Connor, Esq.  
O'Connor & Golder  
24 North Washington  
Port Washington, New York 11050  
Fax: 1-570-619-6007  
*Attorney for Third-Party Defendant  
Jordan Panel Systems Corp.*

Mark S. Krieg, Esq.  
Krieg & Associates, P.C.  
5 Heather Court  
Dix Hills, New York 11746  
*Attorneys for Third-Party Defendants  
Counsilman/Hunsaker & Associates and  
Entek Engineering, PLCC*

Christopher A. Albanese, Esq.  
Milber, Makris, Plousadis & Seiden, LLP  
3 Barker Avenue, 6<sup>th</sup> Floor  
White Plains, New York 10601  
*Attorneys for Third-Party Defendant  
Vollmer Associates, LLP*

Richard P. Dyer, Esq.  
Thelen, Reid Priest, LLP  
875 Third Avenue  
New York, New York  
*Attorneys for Third-Party Defendant  
LBL Skysystems Corporation*

Robert Mark Wasko, Esq.  
Torre, Lentz, Gamell, Gary & Rittmaster, LLP  
226 West 26<sup>th</sup> Street, 8<sup>th</sup> Floor  
New York, New York 10001-6785  
*Attorneys for Fourth-Party Defendants,  
G.M. Grocetti, Inc. and Carolina Casualty Ins. Co.*

**and**

Vincent J. Zichello, Esq.  
Zichello & McIntyre, LLP  
The Graybar Building  
420 Lexington Avenue  
New York, NY 10170

*Attorneys for Fourth-Party Defendant Carolina Casualty*

Martin P. Lavelle, Esq.  
Law Offices of Martin P. Lavelle  
110 William Street, 18<sup>th</sup> Fl.  
New York, New York 10038  
*Fourth-Party Defendant,*  
*National Union Fire Insurance Company of Pittsburgh, Pa.*

Lance J. Kalik, Esq.  
Riker, Danzig, Scherer, Hyland & Perretti, LLP  
One Speedwell Avenue  
Morristown, NJ 07962  
*Attorneys for Fourth-Party Defendant,*  
*Harleysville Mutual Ins. Co.*

Stephen P. Schreckinger, Esq.  
Gogick, Burne & O'Neill, LLP  
11 Broadway, Suite 1560  
New York, New York 10004  
*Attorneys for Third-Party Defendant,*  
*Weidlinger Associates Consulting Engineers, P.C.*

Cheryl L. Davis, Esq.  
Menaker, Herrmann, LLP  
10 East 40<sup>th</sup> Street, 43<sup>rd</sup> Fl.  
New York, New York 10006  
*Attorneys for Third-Party Defendant,*  
*Shen Milson & Wilke, Inc.*

Annalee Cataldo-Barile, Esq.  
Sinnretch, Safar & Kosakoff, LLP  
320 Carleton Avenue, suite 3200  
Central Islip, NY 11722  
*Attorneys for John A. VanDeusen & Assoc. Inc.*

Barry Jacobs, Esq.  
Abrams, Gorelick, Friedman & Jacobson, P.C.  
One Battery Park Plaza, 4<sup>th</sup> Fl.  
New York, New York 10004  
*Attorneys for Third-Party Defendant,*  
*Warfel Schrager Architectural Lighting, LLC*

Michael P. Catina, Esq.  
Wilson, Elser, Moskowitz, Edelman & Dicker  
3 Gannett Drive

White Plains, New York 10604  
Fax: 914-323-7001  
*Attorneys for Third-Party Defendant,  
Theatre Projects Consultants*

Fe D. Tesoro, Esq.  
Law Office of Vincent P. Crisci  
17 State Street, 8<sup>th</sup> Floor  
New York, New York 10004  
*Attorneys for Poulin & Morris*